

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

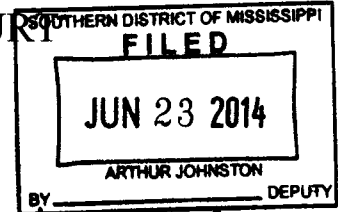
United States of America)

v.)

AUDREY LASHAY TILLMAN)

Case No. 3:14mj134-LRA

(UNDER SEAL)



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 19, 2014 in the county of Madison in the
Southern District of Mississippi, the defendant(s) violated:

Code Section

18 U.S.C., Section 1591

Offense Description

On June 19, 2014, Audrey Lashay Tillman recruited, enticed, transported, provided and maintained a female child to engage in commercial sex acts, knowing said child had not obtained the age of 18 years in violation of Section 1591, Title 18, United States Code.

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent Cynthia Bobe attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.

Cynthia Bobe

Complainant's signature

Special Agent Cynthia Bobe, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/23/2014

Judge's signature

City and state: Jackson, Mississippi

Hon. Linda R. Anderson, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**STATE OF MISSISSIPPI
COUNTY OF HINDS**

AFFIDAVIT

I, Cynthia Bobe, a Special Agent (SA) with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for over 10 years. I am currently assigned to the Jackson Division of the FBI. While employed by the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation and child pornography. I have gained experience through numerous training opportunities and everyday work related to conducting these types of investigations. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

2. This affidavit is made in support of a Criminal Complaint and application for a warrant of arrest for AUDREY LASHAY TILLMAN of 313 Lawrence Road, Jackson, Mississippi for violation of Title 18, United States Code Section 1591. This statute makes it a federal offense to knowingly recruit, entice, harbor, transport, provide, obtain, or maintain a minor (defined as someone under 18 years of age) knowing or in reckless disregard of the fact that the victim is a minor and would be caused to engage in a commercial sex act. "Commercial sex act" is defined very broadly to include "any sex act, on account of which anything of value is given to or received by any person."

3. I am familiar with the information contained in the Affidavit based upon the investigation I have conducted and based on my conversations with other law enforcement officers who have engaged in numerous investigations involving the human trafficking of minor children, sexual exploitation of children and child pornography.

4. The information set forth herein is provided as a broad overview of the investigation to date. It does not include a listing of all investigative techniques employed or even the full and complete results of any of the listed investigative efforts.

PROBABLE CAUSE

5. On June 19, 2014, the FBI's Child Exploitation Task Force conducted undercover operation in support of a nationwide enforcement initiative aimed at deterring child exploitation, prostitution and human trafficking of minor children.

6. On June 19, 2014, in Madison County, in the Southern District of Mississippi, undercover officers placed a telephone call to an internet ad posted on a site known to law enforcement that is used for prostitution.

7. On June 19, 2014, in response to the undercover officer's phone call, a female, arrived and knocked on the door of the undercover officer's hotel room at the Drury Inn and Suites, located at 610 County Line Road, Ridgeland, Mississippi. The female brought another female with her and they offered sexual acts in exchange for money.

8. Task force officers detained and interviewed both females and determined one of them to be a 17 year old (hereinafter referred to as "victim"), date of birth xx/xx/1996. The victim was driven to the hotel by AUDREY LASHAY TILLMAN, SSN: xxx-xx-3593, date of birth June 29, 1986. The victim stated that she met TILLMAN approximately three months ago.

TILLMAN resides at 313 Lawrence Road, Jackson, Mississippi. The victim advised that TILLMAN took photographs of her and posted them to the website. The victim stated that TILLMAN paid to have the victim's hair done and purchased the victim new clothing. The victim also said that TILLMAN told her that she would be having sex with men for money.

9. When TILLMAN and the victim arrived at the hotel and were detained, a Smith and Wesson semi-automatic pistol was discovered concealed in TILLMAN'S purse. The victim told investigators that TILLMAN told her to protect TILLMAN with that gun if she had to.

10. The prostitution and/or human trafficking of minor children are prohibited by 18 U.S.C. § 1591. This statute makes it a federal offense to knowingly recruit, entice, harbor, transport, provide, obtain, or maintain a minor (defined as someone under 18 years of age) knowing or in reckless disregard of the fact that the victim is a minor and would be caused to engage in a commercial sex act. "Commercial sex act" is defined very broadly to include "any sex act, on account of which anything of value is given to or received by any person."

11. Title 18, United States Code Section 1591 also makes it a crime for individuals to participate in a business venture that obtains minors and causes them to engage in commercial sex acts. Section 1591 is called "Sex trafficking of children by force, fraud, or coercion." it does not require proof that either the defendant or victim crossed state or international lines.

CONCLUSION


12. The facts contained herein are presented for the limited purpose of documenting probable cause and are not the only facts known in this matter. Based on these facts, your affiant believes there is probable cause to believe that AUDREY LASHAY TILLMAN,

previously identified, knowingly drove the 17 year old victim to a hotel in Madison County, Mississippi, in the Southern District of Mississippi, for the purposes of prostitution and financial gain, all in violation of Title 18 USC 1591.

13. It is further respectfully requested that this Court issue an Order Sealing, until further order of this Court, all papers submitted in support of the criminal complaint, affidavit and warrant for arrest. Sealing is necessary because the information in this affidavit is relevant to an ongoing investigation and premature disclosure of the contents of this affidavit and related documents may have a negative impact on this continuing investigation and may jeopardize its effectiveness.

Your affiant, therefore, respectfully requests that this Court issue a warrant for the arrest of AUDREY LASHAY TILLMAN.

Respectfully submitted,



Cynthia Bobe
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on 23rd day of June, 2014.



HONORABLE LINDA R. ANDERSON
UNITED STATES MAGISTRATE JUDGE